



JAMES E. JOHNSON
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

WILLIAM G. RIVES
Senior Counsel
Cell: (646) 581-8031

March 10, 2021

VIA ECF

Hon. Alvin K. Hellerstein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

The conference is adjourned to May 21, 2021, at 10:00 a.m.

So ordered,
/s/ Hon. Alvin K. Hellerstein
March 10, 2021

Re: *M.A. obo K.B. v. N.Y.C. Dep't of Educ.*, 20-cv-4589 (AKH)(GWG)

Dear Judge Hellerstein:

I am Assistant Corporation Counsel in the office of Corporation Counsel James E. Johnson, attorney for Defendant in the above-referenced action wherein Plaintiff seeks attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

I write to respectfully request an extension of time to hold an initial conference, from March 12 to May 12, 2021. Plaintiff consents to this request. This is the first request for an extension. We apologize for the lateness of this request and for any inconvenience to the Court as a result. We have reviewed Plaintiff's billing records and associated document and have made an offer of settlement. At this juncture, the parties are negotiating, but I am optimistic a settlement can be reached without further burden to the court.

Accordingly, Defendant respectfully requests that the initial pretrial conference be rescheduled to May 12, 2021.

Thank you for considering this request.

Respectfully submitted,

/s/

William G. Rives
Senior Counsel

cc: Irina Roller, Esq (via ECF)